

## **DECLARATION of CALEB MICHAUD**

I, Caleb Michaud, do hereby declare:

### **Agent Background**

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) Medford where I have served since December 2020. As a SA with HSI, I received training from the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia, graduating from Criminal Investigator Training Program (CITP) and the Homeland Security Investigations Special Agent Training Program. Prior to becoming a SA with HSI, I was an active-duty combat engineer in the United States Army for approximately ten years.

### **Purpose of this Declaration**

2. This declaration is submitted in support of a complaint *in rem* for forfeiture of:
- \$882,593 seized from Matthew SACHEN's residence on May 13, 2022.
  - \$24,187 seized from Propack & Ship (PPS) on May 13, 2022.
  - \$285,090.74 seized from a Northwest Community Credit Union account ending in 7513 on May 13, 2022, in the name of Matthew SACHEN.

As set forth below, I have probable cause to believe that the currency is subject to forfeiture pursuant to Title 21, United States Code, Section 881(a)(6) as they are moneys furnished or intended to be furnished by any person in exchange for a controlled substance, proceeds traceable to such an exchange, and moneys used or intended to be used to facilitate the distribution of controlled substances in violation of Title 21, United States Code, Section 841 and 846.

3. This declaration is intended to show only that there is sufficient probable cause

and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

### **Statement of Probable Cause**

5. Propack & Ship (PPS) is a privately-owned business that ships packages through the United States Post Office (USPS), United Parcel Service (UPS), and FedEx. Until on or about October 2022, Propack & Ship (PPS) was located at 2728 West Main Street, Medford, Oregon 97501.

9. Jackson County Sheriff's Office Detective Groom, who is a member of the Medford Police Department Illegal Marijuana Enforcement Team (IMET), began surveillance on the Propack & Ship store and associated individuals throughout year 2021 and into early 2022. The investigation was initiated based on credible information that Propack & Ship was knowingly assisting marijuana growers illegally ship marijuana out of state. During his investigation, Detective Groom learned Richard SACHEN passed away in late 2021 and his son, Matthew SACHEN, assumed the roles of owner and manager of Propack & Ship. Jackson County records checks reveal Matthew SACHEN took ownership of Propack & Ship, LLC on February 9, 2022. Detective Groom observed Matthew SACHEN opening the store, daily with keys, and working behind the counter, daily, at Propack & Ship. Detective Groom noticed Susan CORDERO working at the store most of the time, but Matthew SACHEN was the only

individual viewed opening the store with keys.

10. In early 2022, Detective Groom learned IMET Detective Dode, who is also an HSI Task Force Officer (TFO), had served an HSI subpoena to Propack & Ship on behalf of HSI Key West, FL. TFO Dode produced a copy of the subpoena, which was served on September 1, 2020, and requested video surveillance footage and shipment information for four packages originating from Propack & Ship that were seized in Key West, FL and found to contain marijuana. TFO Dode advised Propack & Ship did not have video surveillance at the time.

11. In February 2022, Detective Groom discussed the case with IMET Sergeant Lytle and determined HSI Medford should become involved in the investigation. HSI Medford assigned me to the investigation, and I initiated an HSI case on March 9, 2022.

12. In March 2022, HSI Medford and IMET placed an audio recording device on an undercover Detective, hereinafter referred to as "UC", and directed UC to ship marijuana at Propack & Ship. IMET Detectives provided UC with approximately 16 pounds of lawfully seized marijuana from Jackson County Sheriff's Office (JCSO) evidence storage. The marijuana was loosely packaged in multiple one-pound turkey bags, to emit a strong odor, and subsequently placed in a cardboard box. Prior to the operation, multiple IMET Detectives and I verified the box emitted an overwhelmingly strong odor of marijuana. UC was told to request assistance from Matthew SACHEN at Propack & Ship with packaging the marijuana in a manner that would mask the odor. The following is a summary of the first controlled marijuana shipment:

*UC carried a large cardboard box, containing loosely packaged marijuana, and spoke with Matthew SACHEN at the counter about shipping the box. UC pointed out the box he/she was shipping smelled strongly. UC asked if Matthew SACHEN could "double-box" the*

*package to conceal the smell. UC did not say the word "marijuana", but it was clear that Matthew SACHEN knew there was marijuana in the box when Matthew SACHEN began to advise the use of a "Vault" (Vettles Vault) for shipping. The Vettles Vault is a plastic container that is made for shipping and storage of dog food, with a screw top lid. Matthew SACHEN began explaining the container could help conceal the smell and explained the different sized Vaults and how many "pounds" could fit in each Vault. Matthew SACHEN told the UC to repackage the shipment using the provided Vault and return with it. Matthew SACHEN explained the Vault then would fit inside a cardboard box.*

*UC carried the shipping container out to his/her car and Matthew SACHEN followed him carrying the purposefully smelly, marijuana filled cardboard box. At this time, Matthew SACHEN had not yet charged UC for the container. UC then drove his/her vehicle to the back of the Propack & Ship parking lot and placed the marijuana inside the Vault and then returned to the Propack & Ship store. Matthew SACHEN then placed the Vault in a cardboard box and placed package peanuts on and around the vault and secured the cardboard box with the marijuana inside. Matthew SACHEN and UC discussed the shipping time and settled on FedEx two-day ground. UC provided the address he/she was shipping to, and they discussed that it was not necessary to put UC's name on the shipment. Matthew SACHEN explained how he would just put the Propack & Ship address as the return address. Matthew SACHEN charged the UC \$75 dollars for shipping materials and \$470.88 for the shipment. UC paid with cash. This transaction was audio recorded and a copy was later placed into evidence.*

13. After shipping the package, UC left the location. The package was later recovered by K9 Officer Havice from the FedEx shipping company as it was being transported to

a sorting facility. The marijuana package was returned to JCSO evidence storage. The receipt for the transaction, the shipping container and box were all photographed and placed into evidence at JCSO evidence storage.

14. Detective Groom subsequently researched the shipping costs of this package at other FedEx locations around Medford. The shipping container, "Vettles Vault," that UC purchased from Matthew SACHEN for \$75.00 is sold at Grange Co-Op at 3531 S Pacific Highway, Medford, for \$47.99. The FedEx Ship Center at 3600 Terminal Spur Road, Medford, would have charged \$263.90; and the FedEx Office Print & Ship Center at 1594 Biddle Road, Medford would have charged \$282.85 for the same package. Even with the \$75.00 price of the Vault, and the higher price of the two locations (\$282.85), the total price for shipment would have been \$357.85 – which is \$113.03 lower than the Propack & Ship price of \$470.88. IMET and HSI Medford believe this price difference is due to the increased risk Propack & Ship assumed when knowingly shipping contraband from the store.

15. On March 19, 2022, I contacted HSI Key West regarding ProPack & Ship LLC. HSI Key West stated a source of information in a Key West UPS facility noticed a pattern of packages containing a large amount of US Currency being shipped from Kelly RASPA to ProPack & Ship LLC. HSI Key West learned through their investigation that RASPA would receive packages of marijuana in various Key West locations using fake names and return cash payments via UPS to Austen LETRICK at ProPack & Ship in Medford, OR. HSI Key West served multiple search warrants on packages sent to RASPA and a residence connected to RASPA and obtained consent search of RASPA's phone which contained photos and information connected to marijuana operations in the Medford, OR area. Additionally, HSI Key

West served a federal grand jury subpoena to ProPack & Ship for information related to outgoing and incoming packages involving RASPA and LETRICK – identifying 41 packages sent from Key West, FL to LETRICK at Propack & Ship LLC (box no. 173). Based on the amount of currency witnessed by the source in UPS, HSI Key West estimated the total amount of currency sent to LETRICK at ProPack & Ship is approximately \$1.2 million between February 02, 2020, and August 19, 2020.

16. I conducted system checks on LETRICK and discovered LETRICK has bought various properties in Southern Oregon from Justin PITTS who is a cooperating defendant in an OCEDEFT large-scale black market marijuana investigation conducted by HSI Medford and HSI Raleigh. Additionally, LETRICK and an individual named Jonathan QUINTERO are members of RV MAIN, LLC (created December 2021), with a principal place of business address listed as 2728 Main Street, Medford, OR 97501 (Propack & Ship).

17. In early April 2022, HSI Medford and IMET conducted a second controlled shipment at Propack & Ship. The same UC this time wore an HSI audio and video recording device to gain better quality recording of the operation. IMET Detective Groom prepared a similar package to the first shipment, again containing loosely packaged marijuana inside turkey bags and placed into a cardboard box. Prior to the operation, multiple IMET Detectives and I verified the box emitted an overwhelmingly strong odor of marijuana. Additionally, I asked UC to ask Matthew SACHEN about receiving currency in packages through Propack & Ship in a similar fashion LETRICK is suspected of in the HSI Key West case. The following is a summary of the second UC controlled shipment operation at Propack & Ship.

*UC entered Propack & Ship at mid-morning and met with Matthew SACHEN who was*

*the only person working at the store. Matthew SACHEN seemed to recognize UC from the previous shipment. UC asked for another Vault for the package and Matthew SACHEN commented on how good the containers conceal odor. Matthew SACHEN asked for the shipping address, and UC told Matthew SACHEN the address, which was the same as the first controlled shipment. As Matthew SACHEN inputted the address in the store computer, Matthew SACHEN stated the receiving party name, indicating the computer stored previous addresses and recipients. UC confirmed the name was correct. UC then opened the box of marijuana and Matthew SACHEN assisted UC with repackaging the marijuana into a Vault. Matthew SACHEN did not handle the bag of marijuana but assisted with boxing and taping up the Vault. While doing this UC asked Matthew if the store (Propack & Ship) had been busy. Matthew SACHEN stated business had been slow because everyone was working on their greenhouses, getting their grows all ready, the soil, and beds - indicating that his business tempo is directly related to what marijuana growers are doing.*

*While the marijuana was being repackaged, Matthew SACHEN asked UC if he/she had ever tried vacuum sealing them, clearly referring to the packaging of marijuana. Matthew SACHEN suggested this method would allow more product to fit in the Vettles Vault.*

*UC then asked if he/she was able to receive cash at Propack & Ship. Matthew SACHEN responded, "absolutely, so um, you just tell us, like whatever name that you're using, and then uh, we just charge 30 dollars a package, and we keep it in that back room when we get it, and then you just come in, 30 dollars, and it's all yours." Matthew SACHEN then suggested getting a P.O. Box and they wave the \$30-dollar fee. Matthew SACHEN quoted the prices for the P.O. Boxes at \$15, \$20, \$30 depending on the size. Matthew SACHEN then stated, "you can get*

*mail, or anything, you know cash or packages, whatever you want.”*

*While UC was speaking with Matthew SACHEN, an unknown male entered the Propack & Ship to ship a box. Matthew SACHEN moved from behind the counter and closed UC's box containing additional marijuana and moved the box to the side, concealing it from the male who entered. The male looked inside the UC 's box with the Vittles Vault inside and made a comment how the vaults come in handy. Matthew SACHEN discussed the cost of shipping with the male and talked about how USPS is cheaper but less reliable. Matthew SACHEN eventually talked the male into shipping through UPS. Matthew SACHEN quickly helped the male and the male left the store.*

*After the male left, Matthew SACHEN began discussing carrier options with UC. Matthew SACHEN stated even though FedEx is more expensive, less packages get lost or go missing. Matthew SACHEN continued to discuss UPS, USPS, and FedEx before retrieving a stack of envelopes from behind the counter. Matthew SACHEN held up the envelopes and explained to UC that they were USPS "criminal investigations" envelopes that had been sent to Propack & Ship regarding package seizures. Matthew SACHEN stated, “I’m like, trying to tell people, dude like don’t, like you’re going to lose your stuff.” Matthew charged the UC \$506.12 for this second shipment. UC paid in cash for the shipment, then left the store.*

18. The marijuana package was later recovered by K9 Officer Havice from the FedEx shipping company as it was being transported to a sorting facility. The marijuana package was returned to Josephine County Sheriff’s Office (JCSO) evidence storage. The receipt for the transaction, the shipping container and box were all photographed and placed into evidence at JCSO evidence storage.



19. On April 5, 2022, Detective Groom conducted surveillance on Propack & Ship and noticed what appeared to be a new employee working at the store. Detective Groom conducted DMV checks on the individual's vehicle and determined the identity of the new employee to be QUINTERO. Detective Groom is familiar with QUINTERO's name from previous marijuana investigations. Detective Groom recalled flying over QUINTERO's property at 6001 Foley Lane on several occasions during surveillance, where Detective Groom observed multiple green houses and Conex boxes on QUINTERO's property.

20. On January 4, 2022, Detective Groom and IMET Detectives served an Oregon State search warrant on 3802 Dodge Road, White City, OR – which is owned by QUINTERO. During search warrant execution, IMET Detectives seized 20 firearms, over 2,400 pounds of marijuana, and \$3,050 in US Currency (Cash). QUINTERO was not at the property at the time of the search warrant execution.

21. QUINTERO appears to be related to LETRICK as a business partner through RV MAIN, LLC. RV MAIN, LLC is the owner of Rogue Valley Cannabis, a retail marijuana dispensary operating in Medford, OR. According to Oregon Secretary of State records, QUINTERO and LETRICK established RV MAIN, LLC in December 2021, shortly after the passing of Richard SACHEN. RV MAIN, LLC lists the Propack & Ship location as the principal place of business. Due to the ongoing HSI Key West investigation into LETRICK and Propack & Ship, LETRICK and QUINTERO's business partnership, the timing of establishment and business address for RV MAIN, LLC, and QUINTERO working inside Propack & Ship, IMET and HSI Medford decided to conduct an additional controlled shipment with QUINTERO inside the store.

22. In April 2022, HSI Medford and IMET conducted a third controlled shipment at Propack & Ship. The same UC wore an HSI audio and video recording device during the operation. IMET Detective Groom prepared a similar package to the first and second shipments, again containing loosely packaged marijuana inside turkey bags and placed into a cardboard box. Prior to the operation, multiple IMET Detectives and I verified the box emitted an overwhelmingly strong odor of marijuana. Detective Groom asked UC to attempt to determine QUINTERO's role at Propack & Ship. Prior to entering the store, IMET and HSI Medford verified both Matthew SACHEN and QUINTERO were in the store. The following is a summary of the third UC controlled shipment operation at Propack & Ship.

*UC entered the store at mid-day and contacted Matthew SACHEN. UC asked about purchasing additional Vaults (Vettles Vault) for future shipping and discussed getting a discount on a bulk purchase on a later date. Matthew SACHEN asked for UC 's phone number to text UC about purchasing more Vettles Vaults on a later date.*

*UC then mentioned he/she noticed a new guy working at Propack & Ship today and Matthew SACHEN introduced UC to "Jonathan" who was in the back of the store at the time. Matthew SACHEN directed UC to the back of the store this time and began assisting UC with his/her package near QUINTERO.*

*While talking with Matthew SACHEN, and with QUINTERO sitting a few feet away, UC began removing the marijuana from the cardboard box and placing turkey bags of marijuana in the Vettles Vault. After filling the vault with marijuana, Matthew SACHEN began boxing up the vault in a cardboard box and placing foam peanuts around the vault inside the box. UC talked about potentially having a "cash load" shipped to the Propack & Ship. Matthew SACHEN*

*verified he/she could receive the shipment for \$35 dollars for an individual shipment. Matthew SACHEN then told UC he would put the UC 's cell phone number in his phone so they could text back and forth about the shipment. Matthew SACHEN told UC to text him when the package was coming in and he would look out for it.*

*This entire conversation took place just a few feet from QUINTERO, while QUINTERO was eating. Matthew SACHEN carried the box back over to the counter and began entering the shipping information into his computer. UC stated he was shipping to the same location as before and provided only the zip code. Matthew SACHEN then read from his computer aloud the false name that UC made up with Matthew SACHEN on the first and second shipment as the recipient of the package in West Virginia. This, again, verified the computer at the Propack & Ship stores shipping information from all previous shipments.*

*Matthew SACHEN printed the shipping sticker and continued to talk to UC about the best shipping company to ship with. Again, Matthew SACHEN indicated UPS and FedEx were the best companies to ship with. Matthew SACHEN, again, grabbed a stack of envelopes. Matthew SACHEN stated USPS has sent notification to Propack & Ship about shipments being seized, and stated Propack & Ship received seven seizure notifications in the last two weeks. The total cost to ship the package was \$567.53. Matthew SACHEN continued to discourage use of USPS saying it may be cheaper, but it is riskier. During this conversation, QUINTERO walked over, picked up the packaged marijuana, and walked the marijuana package to the back of the store. QUINTERO then handed UC the cardboard box he/she brought in, and asked UC if he/she wanted QUINTERO to break the box down for him/her. UC told Jonathan he/she would do that and left the store.*

23. The marijuana package was later recovered by K9 Officer Havice from the FedEx shipping company as it was being transported to a sorting facility. The marijuana package was returned to JCSO evidence storage. The receipt for the transaction, the shipping container and box were all photographed and placed into evidence at JCSO evidence storage.

24. In late April 2022, Detective Groom and UC conducted a pretextual phone call with Matthew SACHEN. Detective Groom asked UC to attempt to receive a package containing cash using a false name at Propack & Ship. Detective Groom additionally asked UC to attempt to determine QUINTERO's role at Propack & Ship. The conversation was recorded. The following is a summary of UC's conversation with Matthew SACHEN.

*Matthew SACHEN answered the phone and called the UC by his/her false name. UC asked Matthew SACHEN if he/she could receive a package containing cash at Propack & Ship using a false name. Matthew SACHEN agreed to receive the package containing cash for UC. Matthew SACHEN further advised that UC send a text message with the false name he/she was to use, so Matthew SACHEN can secure the package when it arrived. UC asked Matthew SACHEN about QUINTERO and whether QUINTERO was purchasing the business. Matthew SACHEN explained that QUINTERO had been working on purchasing Propack & Ship from Richard SACHEN prior to his passing, and Matthew SACHEN still felt obligated to sell Propack & Ship to QUINTERO.*

25. On May 11, 2022, Detective Groom applied for and was granted an Oregon State search warrant for the ProPack & Ship business location (2728 W Main Street, Medford, OR 97501) for Oregon State drug violations.

26. On the morning of May 13, 2022, IMET Detectives and I waited for Matthew

SACHEN to depart his residence to detain him prior to the search warrant execution. At approximately 1000 hours, Matthew SACHEN departed his residence and began to walk his dog. IMET Detectives and I contacted and detained and Mirandized Matthew SACHEN. Detective Groom asked for consent for law enforcement to enter Matthew SACHEN's home and Matthew SACHEN granted consent. Detective Groom read the search warrant for Propack & Ship to Matthew SACHEN, and Matthew SACHEN indicated he did not want to speak with law enforcement without an attorney present. Matthew SACHEN chose to remain at home while Investigators executed the search warrant on Propack & Ship. Two law enforcement Officers remained with Matthew SACHEN, while IMET Detectives and I drove to Propack & Ship to assist with warrant service.

27. Also on the morning of May 13, 2022, additional IMET Detectives, and HSI TFO Dode conducted surveillance on Propack & Ship. That morning, TFO Dode observed QUINTERO and CORDERO opening the store at approximately 0900 hours. Once Matthew SACHEN was detained at his residence, the IMET Detectives and TFO Dode executed the search warrant on Propack & Ship. QUINTERO and CORDERO were detained and Mirandized on scene, and both refused to speak with law enforcement on the scene. Once the search of Propack & Ship began, IMET Detectives requested assistance of Southern Oregon High Tech Crime Task Force (SOHTCTF) Detectives to properly search and process digital evidence. During the search, K9 Officer Havice's K9 alerted on two packages inside Propack & Ship.

28. The following items were found and subsequently seized from Propack & Ship:

*Two firearms; \$24,187 US Currency; Two HP Desktop computers; Two Computer*

*Towers; One Point of Sale System (Tablet); One Asset Purchase agreement for Target Business; two packages; and miscellaneous documents.*

29. The above described \$24,187 was seized from the following locations inside Propack & Ship:

- Inside the bathroom / closet, Investigators located a shotgun leaning up against a safe. On top of the safe was a box of shotgun ammunition (12 gauge) and a black leather envelope labeled “Rogue Credit Union.” Inside the black leather envelope, Investigators located \$800 US Currency.
- Inside the dedicated office, Investigators located \$7,000 inside of a backpack belonging to QUINTERO, \$490 loosely on the office desk, \$7,708 in a yellow envelope on the office shelf (located next to ledger notes for the store, dated “5-2” through “5-10” – indicating the week prior to QUINTERO taking ownership of the store), \$4,363 inside a white envelope containing receipts from ProPack & Ship next to the yellow envelope, and \$2,541 inside an additional white envelope.
- Near the register Investigators found a Glock Pistol (Serial# UHR986), \$130 in a drawer near the registers, \$308 in the East Register, and \$257 from the west register.
- On QUINTERO’s person, investigators located \$590 inside his wallet.

30. While Investigators searched Propack & Ship, Detective Groom applied for and was granted an additional search warrant for Matthew SACHEN’s residence in Oregon. Matthew SACHEN is the sole occupant of the residence. At approximately 1250 hours, Detective Groom read the search warrant for Target Residence to SACHEN and investigators began the search.

31. The following items were found and subsequently seized from Matthew SACHEN's residence:

*11 firearms; one large bag of psilocybin mushrooms; one Tupperware container of psilocybin mushrooms, one Asset Purchase Agreement for ProPack & Ship, LLC, two bags of THC caramels, two bags of THC wax; one bag of marijuana, and \$882,593 in US Currency that was located in a cardboard box in the entryway and a safe in Matthew SACHEN'S bedroom.*

32. During the search of his residence, Matthew SACHEN stated he wanted to waive Miranda rights and agreed to answer questions with Detective Groom and me. Prior to asking any questions, Detective Groom called Jackson County Assistant District Attorney (ADA) Virginia Greer and explained the current circumstances. ADA Virginia Greer recommended that Detective Groom re-read Miranda warnings to Matthew SACHEN, while giving Matthew SACHEN the opportunity to confirm his understanding after each line of Miranda warnings. Detective Groom then re-read Miranda warnings to Matthew SACHEN, while pausing and asking Matthew SACHEN if he understood after each line. Matthew SACHEN said he understood each line of Miranda warnings and agreed to speak with Detective Groom and I without an attorney present.

33. Detective Groom and I interviewed Matthew SACHEN in the backyard of his Residence, where Matthew SACHEN could speak with privacy. Detective Groom and I sat across from Matthew SACHEN, around a table Matthew SACHEN kept outside. Matthew SACHEN wore handcuffs on his wrists in front of his body. Matthew SACHEN periodically asked for water or for his nicotine pouches from inside the Residence and SA Michaud and Detective Groom obliged. Matthew SACHEN's dog remained nearby, and Matthew SACHEN

was able to pet his dog while the interview transpired. Matthew SACHEN appeared eager to explain himself and wanted to express that he was cooperative. Additionally, Matthew SACHEN thanked Detective Groom and I for the job we do in law enforcement. The following is a summary of the key points learned during the interview with Matthew SACHEN, and does not contain everything Matthew SACHEN told Detective Groom and me during the interview:

- Matthew SACHEN took over the Propack & Ship after Richard SACHEN passed away on October 24, 2021.
- Matthew SACHEN stated the shotgun found inside Propack & Ship belonged to QUINTERO, and not him.
- Matthew SACHEN explained he wanted to keep his father's business going for the customers and for his father's legacy.
- Matthew SACHEN stated most customers pay in cash, and Matthew SACHEN would either take the cash home and put it in his safe or deposit the cash into his bank account at Northwest Credit Union.
- Matthew SACHEN admitted there was approximately \$600,000 in his safe from the sale of Propack & Ship, LLC to QUINTERO. Matthew SACHEN explained that he and QUINTERO structured a deal to sell the business for \$300,000 in an asset purchase agreement. QUINTERO was to pay the \$300,000 over time, while the \$600,000 was "off the books."
- Matthew SACHEN stated he used an attorney named "Stark" to construct the asset purchase agreement but admitted the attorney did not know about the \$600,000 in cash.



- Matthew SACHEN stated he did not set prices in the computer system, and he simply used predetermined prices setup in the computer before he took ownership of Propack & Ship. Matthew SACHEN admitted he didn't even know how to change prices in the computer.
- Matthew SACHEN said Propack & Ship made between \$9,000 and \$10,000 in cash on their best day of operation.
- Matthew stated he knew what Propack & Ship was doing was illegal.
- Matthew SACHEN consented to a search of his personal cell phone.

34. On June 9, 2022, Detective Groom applied for and was granted Oregon State search warrants for the two packages (Package 1 and Package 2) seized at Propack & Ship during the May 13 search warrant operation. On the same day, Detective Groom and I executed the search warrant on the packages. Package 1 contained \$8,040 US Currency (Cash) and Package 2 contained \$7,960 US Currency (Cash) – totaling \$16,000 US Currency (Cash).

35. In June 2022, I reviewed the forensic download of Matthew SACHEN's cell phone and obtained the following:

- Text message conversation with CORDERO regarding the sale of the business to QUINTERO. Message 413, CORDERO writes to Matthew SACHEN the following – “All business has its highs and lows. That is something to be anticipated. And holy cow, Rick was pulling some major dough!! Another point to make is that Jonathon has access to production and having access to distribution to cut costs will obv be a benefit for him.”

- Video of Matthew SACHEN throwing a large amount of cash around the living room inside his residence and snorting cocaine.
- Text message conversation with a customer named “Greg Propack” in Matthew SACHEN’s phone in which Matthew SACHEN notifies a customer a package has arrived on multiple dates. Matthew SACHEN assures “Greg Propack” that “It’s safe with me” on multiple occasions. Additionally, Matthew SACHEN informs the customer the following, “Just FYI, USPS has been cracking down and has been seizing more packages. We got a bunch of notices from them but all of your information is anonymous and protected since we ship from our store and we don’t give that shit out”
- Text message to a customer named “Bob Huntman” in Matthew SACHEN’s phone stating, “Hey bob, it's Matt from ProPack. Just want to let you know we've got a pretty big load for you today”
- Text message conversation with a customer named “Mike Hopkins” in Matthew SACHEN’s phone in which HOPKINS says, “My buddy is hype about this. He said he has 15,000 pounds of hemp”. To which Matthew SACHEN responds, “Let's ship that shit!!!” Matthew SACHEN later asks, “Hey bro, you got any good coke connects around here??” HOPKINS asks Matthew SACHEN how much he wants, and Matthew SACHEN says, “Yeah yeah haha just want like a g or two” HOPKINS explains the price is \$100 per gram and approximately 1 week later tells

Matthew SACHEN that he “Found another plug on my way to get it. So I'll have two types of stuff from two sources lol”

36. Pursuant to a state warrant, on May 13, 2022, \$285,090.74 was seized from a Northwest Community Credit Union account ending in 7513 in the name of Matthew SACHEN. The search warrant was based on Matthew SACHEN's statement that he knew he knew what Propack & Ship was doing was illegal and he deposited cash from Propack & Ship into his account into his bank account at Northwest Credit Union.

### **CONCLUSION**

37. The evidence in this declaration provides probable cause to believe, and I do believe that the \$882,593 seized from Matthew SACHEN's residence, the \$24,187 seized from Propack & Ship, and the \$285,090.74 seized from a Northwest Community Credit Union account ending in 7513 are moneys furnished or intended to be furnished by any person in exchange for a controlled substance, proceeds traceable to such an exchange, and moneys used or intended to be used to facilitate the distribution of controlled substances in violation of Title 21, United States Code, Section 841 and 846, and are therefore subject to forfeiture pursuant to Title 21, United States Code, Section 881(a)(6).

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Executed this 3rd day of February 2023.

s/ Caleb G. Michaud  
Caleb G. Michaud  
Special Agent